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July 1, 2024

VIA ELECTRONIC FILING

Honorable Mitchell J. Katz
United States District Court, Northern District of New York
James M. Hanley Federal Bldg. P.O. Box 7346
Syracuse, New York 13261

Re: *The Estate of JLA v. The Town of Dewitt, Corey Fike, et al.*
Civil Action No. 5:22-cv-00287-MAD-MJK

Dear Judge Katz:

We represent Defendant Corey Fike, the only remaining defendant, in the above-referenced matter. We write to the Court in response to Mr. Zukher's letter, dated July 1, 2024, requesting a conference with the Court prior to his filing of a motion to amend the complaint to add Sergeant Brent as a defendant.

To the extent Plaintiff's proposed motion to amend the complaint to add Sergeant Brent as a defendant to the lawsuit is allowed to proceed, we respectfully request that expert discovery and summary judgment deadlines be held in abeyance. Proceeding with expert depositions and summary judgment motions does not make sense given the potential addition of a new party.

We look forward to further discussing this at the future conference. Thank you.

Respectfully submitted,

BOND, SCHOENECK & KING, PLLC

A handwritten signature in blue ink, appearing to read "Ryan P. Keleher", written over a light blue rectangular background.

Ryan P. Keleher

RPK/kkg

cc: David E. Zukher, Esq. (via: ECF)